REMARKS

Claims 1-34 are pending. Claims 1, 2, 15, 16, 23 and 24 have been amended. New claim 34 has been added.

Claims 1-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of U.S. Patent No. 6,584,186 (Aravamudan et al.) and U.S. Patent No. 6,421,727 (Reifer et al.)

Claim 1 has been amended to incorporate subject matter that was previously recited in claim 2. No new matter has been added.

Claim 1 now recites "downloading a call service component to a call controller when a network carrier turns on a service corresponding to the call service component, for a particular user area." Referring, for example, to FIG. 1, the recited method includes downloading a call service component to a call controller (e.g., softswitch 26A) when a network carrier turns on a service corresponding to the call service component. The call service component might include, for example, an application component 42 for implementing call behavior or a resource component 44 for providing access to telephony resources by an application component. (*See* FIG. 2)

Systems that implement such a method might, for example, enable a network carrier to install its own services and features in a switch provided by another entity. Additionally, multiple, independent development organizations might be able to create software service components for such a system that readily co-exist and cooperate with each other. (*See* page 3, line 23 - page 4, line 3)

Neither of the asserted references discloses downloading a call service component to a call controller when a network carrier turns on a service corresponding to the call service component, for a particular user area.

The Aravamudan et al. patent merely discloses a call coordinator that loads and executes feature applets to process calls. (*See* column 7, lines 5-23) Those feature applets can be loaded

Applicant : Anita B. Marsh et al.
Serial No. : 09/843,429
Filed   : April 25, 2001
Page   : 9 of 11

Attorney's Docket No.: 06269-030001 / PB 00 0032

from anywhere in the network and may be utilized to deliver certain call processing features as required by particular call sessions. (*See* column 15, lines 7-19)

The Reifer et al. patent merely discloses a browser at a Service Provider's location that downloads a JAVA application which, when executed, provides for service provisioning from a gateway business system (GBS) database. (See column 9, lines 7-14 and FIG. 9)

Neither the Aravamudan et al. patent nor the Reifer et al. patent discloses or suggests downloading *when a network carrier turns on a service.*

Claim 1 should be allowable for at least the foregoing reasons.

Claims 2-14 depend from claim 1 and, therefore, should be allowable for at least the same reasons as claim 1.

Claim 3 should be allowable for at least the following additional reasons. Claim 3 recites "dynamically removing the call service component from the call controller." Implementing such a feature, in combination with the features recited in claim 1, may provide a way to load call service components to a call controller as the services are needed and remove those call service components when they are no longer needed. None of the asserted references discloses or suggests the claimed feature.

Instead, the Aravamudan et al. patent merely describes methods of disconnecting a service and terminating a call. (*See* column 11, lines 45-65) Those methods do not amount to dynamically removing a previously downloaded call service component from a call controller. Nor does the Reifer et al. patent disclose or suggest the feature recited in claim 3.

Claim 3 should be allowable for at least the foregoing additional reasons.

Claims 15-33 also were rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of the Aravamudan et al. patent and the Reifer et al. patent.

Independent claims 15 and 23 have been amended in a manner similar to claim 1. Claims 15 and 23, therefore, should be allowable for at least the same reasons discussed above with reference to claim 1.

Claims 16-22 and 24-33 depend from claims 15 and 23, respectively. Therefore, claims 16-22 and 24-33 should be allowable for at least the same reasons as claim 15 and 23, respectively.

Additionally, claims 17 and 25 recite features similar to those discussed above with reference to claim 3 and which provide an additional basis for allowance. Specifically, claims 17 and 25 recite dynamically removing a call service component. Claims 17 and 25, therefore, should be allowable for at least the same additional reasons that were discussed above with reference to claim 3.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.
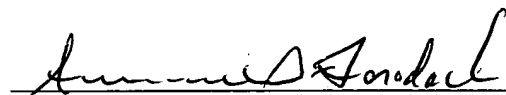
Enclosed is a $50 check for excess claim fees. Please apply any other charges or credits to deposit account 06-1050.

Applicant : Anita B. Marsh et al.
Serial No. : 09/843,429
Filed : April 25, 2001
Page : 11 of 11

Attorney's Docket No.: 06269-030001 / PB 00 0032

Respectfully submitted,

Date: May 9, 2005

Samuel D Borodach

Samuel Borodach
Reg. No. 38,388

Fish & Richardson P.C.
Citigroup Center
52nd Floor
153 East 53rd Street
New York, New York 10022-4611
Telephone: (212) 765-5070
Facsimile: (212) 258-2291

30227878.doc